

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW JERSEY
23-CV571 (JMF)

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JUILIA POTAPOVA,

Plaintiff,

vs.

TOYOTA MOTOR CREDIT CORPORATION,

Defendant.

-----x

DEPOSITION OF: PABLO NICOLAS VARELA

DATE: WEDNESDAY, OCTOBER 30, 2024

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1 Q. What kind of financial difficulty?

2 A. The first is when we tried to get the
3 credit card together, and they gave us like a
4 29.9 interest rate.

5 Then, when we were going to go get a
6 lease of the car, we were going to do it together so
7 we can actually develop credit, same thing. We
8 tried to do it with the credits card, and she got --
9 the lease got denied because of her credit.

10 So I ended up putting it under my
11 name, and the third time was after we got married.
12 We were going to look for a home. We actually found
13 a house in Matawan, New Jersey. The percentage
14 rates were low, I think in the 4 percents or so, and
15 we got denied the loan because of her credit.

16 And now, the percentage rates are
17 where they are, and the houses are where they are.
18 So it would have been nice to have gotten that
19 house, but we didn't. That's why we are still
20 renting.

21 Q. How do you know that these denials
22 were because of her credit?

23 A. Because from the realtor we got --
24 for the house, we got a letter from the realtor.
25 From the dealer, we also got a letter from the

1 lender saying it was about her credit, and then with
2 the credit card, we got the percentage rate that we
3 got.

4 Q. And these letters specifically said
5 it was because of Ms. Potapova's credit that you
6 were being denied or given these high credit scores?

7 A. Yes. No, high credit scores for the
8 credit card. I don't believe we got anything.

9 Q. Okay, the letters specifically said
10 it was because of Ms. Potapova's credit score that
11 you were getting denied and given high interest
12 rates, correct?

13 A. I believe, yes, for the car. The
14 high interest, the high percent interest rate of the
15 credit card, no. They just give it to us.

16 The car, we got denied the lease.
17 The lease was denied because of her, yes. That is
18 why I put it under my name, and then the house, yes,
19 that's also because of the credit, her credit.

20 Q. Just to clarify, the lease and the
21 house you said were because of her; it specifically
22 said it was because of her credit?

23 A. Yes.

24 Q. Okay, and the credit cards didn't
25 specifically say; they just had high interest rates?

1 CERTIFICATE

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3 I, GERALDINE E. LOMBARDY, a Certified Court
4 Reporter of the State of New Jersey, do hereby
5 certify that the witness was duly sworn by me.

6 I FURTHER CERTIFY that the foregoing is a
7 true and accurate transcript of the testimony as
8 taken stenographically by and before me at the time,
9 place and on the date hereinbefore set forth.

10 I FURTHER CERTIFY that I am neither a
11 relative nor employee nor attorney nor counsel of
12 any of the parties in this action and that I am
13 neither a relative nor employee of such attorney or
14 counsel, and that I am not financially interested in
15 the action.

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18 Certified Court Reporter

19 License No. 30XI00228000

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